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August 24, 2015

**VIA ECF**

Justice Sandra L. Townes, U.S.D.J.  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Brown v. Marriott International, Inc.  
**Docket No.: 14 CV 5960 (SLT)(MDG)**  
Our File No.: 105-18017  
Handling Attorneys: Paul A. Fino, Jr. and Daniel M. Stewart

Dear Judge Townes:

Our office represents the defendant Marriott International, Inc. ("MII") in the above-referenced lawsuit. With the court's permission, on behalf of MII we have prepared and are now finalizing a Motion to Dismiss, pursuant to *Federal Rules of Civil Procedure 12(b)(6), 12(b)(7), and 19(b)*, as well as the common-law doctrine of forum non conveniens. The motion is due on August 28<sup>th</sup>.

In accordance with Your Honor's individual rules, please allow this letter to constitute our request to the court to submit a Memorandum of Law that exceeds 25 pages. The reason the Memorandum is lengthy is that it seeks both a *Rule 12(b)(6)* dismissal based upon the failure of each of the plaintiff's five (5) causes of action to state a claim, as well as dismissal on the entirely separate and independent basis of *forum non conveniens*, which requires a three-step analysis. As each of the two grounds upon which dismissal is sought requires an in depth discussion on multiple points, our Memorandum of Law, in order to adequately advocate our client's position, exceeds the length permitted by your individual rules. We thank you for your consideration.

Respectfully,

WHITE, FLEISCHNER & FINO, LLP



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Justice Sandra L. Townes, U.S.D.J.

August 24, 2015

Page 2

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